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IN THE UNITED STATES DISTRICT COURT SOUTHER DISTRICT OF OHIO WESTERN DIVISION

JAMES V. CRITES, et al.,

: Case No. C-1-13-320

Plaintiff,

Hon. Judge Herman J. Weber

-VS-

:

BANK OF AMERICA, N.A., et al.

Defendants.

JOINT PLAN FOR THE CONDUCT OF LITIGATION

Now come Plaintiffs James and Carolyn Crites ("the Crites"), Defendant Bank of America, N.A. ("Bank of America"), and Defendant J.M. Adjustment Services, LLC ("JMA")(collectively, "the Parties"), by counsel, and present the following as their *Joint Plan for the Conduct of Litigation*:

- A. Compliance with 26(a)(1) and 26(f): The Parties have complied with 26(a)(1) and 26(f).
- B. Discovery Limitations: The Parties do not anticipate specific limitations on discovery other than those provided by the Federal Rules of Civil Procedure.
- C. Protective Orders: The Parties do not anticipate the need for protective orders at this time.
- D. Consent to Magistrate Jurisdiction: The Parties do not agree to consent to magistrate jurisdiction.

- E. Summary Adjudication Pursuant to Fed. R. Civ. P 12(b): The Parties agree to the deadlines provided by the Federal Rules of Civil Procedure.
- F. Summary Adjudication Pursuant to Fed. R. Civ. P. 56: The Parties agree to the deadline for dispositive motions discussed below.
- G. Jury Trial: The Crites have requested a jury trial on all claims.
- H. Miscellaneous: The Parties agree that the suggestion of a complex case, RICO statement, remand, and removal are inapplicable or unnecessary in this matter.

PROPOSED JOINT SCHEDULING ORDER

The Parties hereby propose the following deadlines:

Initial Disclosure Deadline: September 20, 2013

Deadline for Joinder and Amendment of Pleadings: December 20, 2013

Expert Witness Disclosure (Primary): April 21, 2014

Expert Witness Disclosure (Rebuttal): May 20, 2014

Discovery Cut-off Date: June 20, 2014

Joint Status Report: 15 days prior to discovery cut-off

Dispositive Motion Deadline: July 25, 2014

Joint Final Pre-trial Order: 30 days prior to trial

Trial: January 5, 2015

Respectfully Submitted,

/s/ Mark B. Lawson

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